



SKYWAY TOWERS

3637 Madaca Lane, Tampa, Florida 33618

Chairman Ajit Pai, Chairman
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

August 31, 2018

Re: WT Dkt. No. 17-79 (Ex Parte Filing)

Dear Chairman, Pai and Commissioners O'Rielly, Carr, and Rosenworcel:

I am the CEO of Skyway Towers. We provide towers to wireless carriers for the deployment of transmitters and associated infrastructure. We have about 500 tower sites in 30 states. I write to thank each of you for your commitment to remove entry barriers to deployment of wireless infrastructure as demonstrated by several orders in the last nine months, and to explain why we believe that removing these barriers is so important.

As you know, the wireless industry is poised to grow exponentially in the next decade as people's reliance on wireless technologies grows and as 5G technology is introduced. To speed the transition to 5G, wireless providers must deploy several hundred thousand new wireless facilities at about 100 times more antenna locations than today.

Unfortunately, a multitude of impediments to deployment of this new infrastructure have threatened to unnecessarily delay 5G service. Sixteen months ago, the Commission called for recommendations about what actions it should take to eliminate these impediments. After digesting several thousand pages of suggestions, the agency began to act, issuing orders in November of last year as well as in March and August of this year that removed several discrete entry barriers that existed because of outdated interpretations of provisions in the National Environmental Protection Act and the National Historic Preservation Act.

From a macrosite perspective, one large impediment continues to plague the industry, the requirement of Native American Tribal review of even those proposed sites that are not being built on tribal lands. Other industries, such as fast food chains and gas stations can build even larger and more visible outlets without being required to have those proposed sites reviewed by the tribal nations. By contrast, our industry must submit the very same locations for analysis by the tribes. Recent actions by the Commission attempting to remedy the problem have actually slowed deployment of new sites, both rural and suburban, because the tribes have disbanded the offices they once had to review sites, and off-loaded the burden of those reviews to the Commission staff.

Also, we understand that the Commission hopes to act within the next several weeks to remove a variety of impediments that result from local government policies as well. Examples include requirements for carriers to submit applications to local authorities to deploy new infrastructure that are overly complex, processing times to consider those applications that are too lengthy, and application fees that are too high.

We strongly support removal of these impediments to deploying 5G infrastructure. Doing so will speed the transition from 4G service to 5G service, and assist in closing the Digital Divide, thereby dramatically improving wireless service for all consumers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Behuniak', with a long, sweeping horizontal stroke extending to the right.

Dan Behuniak, CEO